

# BRAVERMAN | GREENSPUN

A PROFESSIONAL CORPORATION

October 5, 2020

**Via ECF Filing**

Hon. Martin Glenn  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
New York, NY 10004-1408

Re: In re: Kanwaldeep Singh Kalsi, Case No. 20-10330-mg

Your Honor:

My firm serves as General Counsel to the Board of Managers (the “Board”) for 67 Liberty Street Condominium Association (“67 Liberty”). The petitioner in the above-referenced proceeding, Kanwaldeep Singh Kalsi, is the owner of Unit 5 at 67 Liberty Street, New York, New York (the “Unit”) and has failed to pay his common charges related to his ownership interest in full since August 2019. As the Board understands it, Mr. Kalsi has knowingly failed to disclose this debt to the Court since he filed his Petition in February 2020. Therefore, the Board respectfully requests that the Court compel Mr. Kalsi to pay his outstanding common charges, as well as the legal fees that the Board has incurred in attempting to recover these charges.

Since Mr. Kalsi filed his bankruptcy petition in February 2020, Mr. Kalsi has defaulted on his common charge payments for the Unit in the amount of \$16,197.78, which is reflected in the enclosed ledger. In addition, pursuant to Section 6.5 of the by-laws governing the condominium, Mr. Kalsi is responsible to reimburse the Board for all of its professional fees, including attorney’s fees, incurred as a result of Mr. Kalsi’s defaults, which continues to accrue and is now over \$7,000. Based upon my review of Mr. Kalsi’s submissions to the Court, Mr. Kalsi has knowingly failed to disclose that he has defaulted on these common charge payments.

Through its managing agent, the Board has reached out to Mr. Kalsi numerous times demanding payment to no avail. I also reached out to Mr. Kalsi’s counsel several times since September 8, 2020 but did not get a substantive response until just today. Mr. Kalsi’s counsel, Alla Kachan, advised me that Mr. Kalsi is simply unwilling to pay the common charge fees while he contemplates converting the instant Chapter 11 proceeding into one pursuant to Chapter 7. However, until that conversion is granted, Mr. Kalsi remains responsible to the Board for the aforementioned sums.

Hon. Martin Glenn

October 5, 2020

Page 2 of 2

The Board respectfully requests that the Court compel Mr. Kalsi to pay his debts to the Board due and owing since February 2020. The Board thanks the Court in advance of its consideration of its request. Should the Court require any additional information or require the Board to appear for a conference to discuss the contents of this letter, the Board will make itself available at the Court's convenience.

The foregoing is written without prejudice to and with a full reservation of all of the rights and remedies of the Board and of 67 Liberty.

Very truly yours,

*Benjamin Fox Tracy /s/*

Benjamin Fox Tracy

Encl.

cc: Alla Kachan, Esq. (via ECF Filing)

## 67 LIBERTY CONDO ASSOCIATION Resident Statement

Resident:	KALSI, KANWALDEEP (R 0000010940)	Move In Date:	1/1/1951	Deposits Required:	0.00
Resident Id:	0853-1-05-1	Current Lease:	1/1/1951	Deposits Received:	0.00
From:	07/2019	Notice To Vacate:		Current Balance:	25,424.90
Through:	10/2020	Vacate Date:			

Date	Type	Description	Charges	Payments/Credits	Balance
07/01/2019	Balance	Balance Forward			0.00
07/01/2019	COMMON CHARGE	July Charge	1,318.16		1,318.16
07/10/2019	Credit Card Payment	Credit Card		1,318.16	0.00
08/01/2019	COMMON CHARGE	August Charge	1,318.16		1,318.16
08/16/2019	LATE FEE	RM LATE FEE	250.00		1,568.16
09/01/2019	COMMON CHARGE	September Charge	1,318.16		2,886.32
09/16/2019	LATE FEE	RM LATE FEE	250.00		3,136.32
10/01/2019	COMMON CHARGE	October Charge	1,318.16		4,454.48
10/04/2019	Credit Card Payment	Credit Card		1,500.00	2,954.48
10/18/2019	LATE FEE	RM LATE FEE	250.00		3,204.48
11/01/2019	COMMON CHARGE	November Charge	1,318.16		4,522.64
11/16/2019	LATE FEE	RM LATE FEE	250.00		4,772.64
12/01/2019	COMMON CHARGE	December Charge	1,318.16		6,090.80
12/16/2019	LATE FEE	RM LATE FEE	250.00		6,340.80
01/01/2020	COMMON CHARGE	January Charge	1,318.16		7,658.96
01/16/2020	LATE FEE	RM LATE FEE	250.00		7,908.96
02/01/2020	COMMON CHARGE	February Charge	1,318.16		9,227.12
02/20/2020	LATE FEE	RM LATE FEE	250.00		9,477.12
03/01/2020	COMMON CHARGE	March Charge	1,318.16		10,795.28
03/20/2020	LATE FEE	RM LATE FEE	250.00		11,045.28
04/01/2020	COMMON CHARGE	April Charge	1,318.16		12,363.44
05/01/2020	COMMON CHARGE	May Charge	1,318.16		13,681.60
06/01/2020	COMMON CHARGE	June Charge	1,318.16		14,999.76
07/01/2020	COMMON CHARGE	July Charge	1,318.16		16,317.92
08/01/2020	COMMON CHARGE	August Charge	1,318.16		17,636.08
09/01/2020	COMMON CHARGE	September Charge	1,318.16		18,954.24
09/18/2020	LATE FEE	RM LATE FEE	250.00		19,204.24
10/01/2020	COMMON CHARGE	October Charge	1,318.16		20,522.40
10/01/2020	REIM EXP LEGAL FEES	Legal Fees	4,902.50		25,424.90

### Recurring Charges

Effective Dates	Description	Amount	Current?
3/1/2019-12/31/2050	COMMON CHARGE	\$1,318.16	Y